

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff	)	CR. No. 05-10052-RCL
	)	
v.	)	
	)	
JEREL LESLIE	)	
	)	
Defendant	)	
_____	)	

**MOTION FOR APPROVAL OF EXPENDITURE OF FUNDS FOR A PRIVATE  
INVESTIGATOR**

Now comes the Defendant in the above captioned matter by and through his attorney and requests this Honorable Court to approve the expenditure of funds in excess of \$1000 for an investigator.

In support hereof, the Defendant submits the following:

This indictment charges the Defendant with 18 U.S.C. Sec. 922(g)(1); Possession of a Firearm and Ammunition by a Felon. It is anticipated that, if convicted the government will be seeking a substantial term of imprisonment (in excess of 15 years) for the Defendant under the guidelines and the applicable mandatory sentencing provisions. Since the Defendant is approximately 24 years old, if convicted he will most likely spend a substantial part of his adulthood in prison. He has entered a plea of not guilty and intends to put the government to its proof.

The evidence against the Defendant consists in part of the testimony of a police officer who stopped the vehicle in which the Defendant was a passenger.

There has already been a suppression hearing in state court in connection with this matter. In that hearing the police officer referenced above along with other witnesses provided conflicting testimony with regard to the initial stop of the vehicle. There are a

number of issues in connection with the initial stop of the vehicle that require investigation. These issues include but are not limited to: when the officer could have first seen the vehicle, which street the vehicle was travelling on when first observed, where the vehicle allegedly ran a Stop sign, and whether the intersection is marked with a Stop sign or other marks requiring the vehicle to Stop.

An investigator is necessary to prepare the Defendant's Motion to Suppress. The Defendant needs to survey and document the scene where the vehicle was alleged to have committed a traffic violation. Additionally, the Defendant will attempt to interview other individuals named as being present in the vehicle at the time of the stop, specifically, the driver of the vehicle and the front seat passenger. It is not known whether these individuals will allow themselves to be interviewed but an attempt will be made to interview each of them.

The above is only an outline of the work of the investigator. It is expected that other leads will be produced by the interviews.

Because of the extensive nature of the investigation and the numerous persons who must be located and contacted, of which a certain number are expected to be uncooperative, the Defendant would request that an expenditure of amount not to exceed \$5000 be authorized for the employment of an investigator.

**JEREL LESLIE**

By his attorney,

/s/ ***Albert F. Cullen, Jr.***

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Dated: September 21, 2005

I, Albert F. Cullen, certify that I understand that all counsel will receive electronic notice of the electronic filing of this pleading.

/s/ **Albert F. Cullen, Jr.**  
Albert F. Cullen, Jr.